

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA  
Title III  
No. 17 BK 3283-LTS  
(Jointly Administered)

This filing relates to the  
Commonwealth and ERS.

ORDER GRANTING FOUR HUNDRED SEVENTY-FOURTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE  
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO TO DEFICIENT ADR CLAIMS

Upon the *Four Hundred Seventy-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient ADR Claims* [ECF No. 21423] (the “Four Hundred Seventy-Fourth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Seventy-Fourth Omnibus Objection.

Commonwealth of Puerto Rico (“ERS, and together with the Commonwealth, the “Debtors”), dated July 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors, as more fully set forth in the Four Hundred Seventy-Fourth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Seventy-Fourth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Seventy-Fourth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each the claims identified in Exhibit A to the Four Hundred Seventy-Fourth Omnibus Objection (the “Claims to Be Disallowed”) having been found to be deficient; and the Court having determined that the relief sought in the Four Hundred Seventy-Fourth Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Seventy-Fourth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Seventy-Fourth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21423 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Seventy-Fourth Omnibus Objection**

Four Hundred Seventy-Fourth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	MENDOZA RUIZ, OREALIS URB. LA RIVIERA 1267 C/54 SE SAN JUAN, PR 00921	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	21531	Undetermined*
Reason: Proof of Claim purports to assert liabilities associated with outstanding litigations; however, neither the proof of claim nor supporting documentation provided enough information for the Debtors to understand whether any liabilities are owed by the Debtors. The Debtors have made multiple attempts to contact claimant by email, mail, and/or telephone, but claimant either has not responded to Debtors' requests, or claimant's response still does not provide enough information to enable the Debtors to understand whether any liabilities are owed.						
2	PADILLA ORTIZ, MARISEL PO BOX 561136 GUAYANILLA, PR 00656	05/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	16416	Undetermined*
Reason: Proof of Claim purports to assert liabilities associated with outstanding litigations; however, neither the proof of claim nor supporting documentation provided enough information for the Debtors to understand whether any liabilities are owed by the Debtors. The Debtors have made multiple attempts to contact claimant by email, mail, and/or telephone, but claimant either has not responded to Debtors' requests, or claimant's response still does not provide enough information to enable the Debtors to understand whether any liabilities are owed.						
3	PEREZ SANCHEZ , EVELYN AQUEYBANA 704 PUERTO REAL CABO ROJO, PR 00623	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	108716	Undetermined*
Reason: Proof of Claim purports to assert liabilities associated with outstanding litigations; however, neither the proof of claim nor supporting documentation provided enough information for the Debtors to understand whether any liabilities are owed by the Debtors. The Debtors have made multiple attempts to contact claimant by email, mail, and/or telephone, but claimant either has not responded to Debtors' requests, or claimant's response still does not provide enough information to enable the Debtors to understand whether any liabilities are owed.						

Four Hundred Seventy-Fourth Omnibus Objection  
Exhibit A - Claims to Be Disallowed

NAME	DATE FILED	CASE NUMBER	DEBTOR	ASSERTED CLAIM	
				CLAIM #	AMOUNT
4 SANTINI MÉLENDEZ, EVELYN MIGNA RIVERA ORTIZ CRUZ & RIVERA LAW OFFICES PO BOX 768 COAMO, PR 00769	03/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	2410	Undetermined*
Reason: Proof of Claim purports to assert liabilities associated with outstanding litigations; however, neither the proof of claim nor supporting documentation provided enough information for the Debtors to understand whether any liabilities are owed by the Debtors. The Debtors have made multiple attempts to contact claimant by email, mail, and/or telephone, but claimant either has not responded to Debtors' requests, or claimant's response still does not provide enough information to enable the Debtors to understand whether any liabilities are owed.				TOTAL	Undetermined*